

**EXHIBIT F**  
**ROBIN TERRAZAS AS THE ALBERT SIDNEY**  
**JOHNSTON CHAPTER**  
**DEPOSITION**

1                   UNITED STATES DISTRICT COURT  
2                   WESTERN DISTRICT OF TEXAS  
3                   SAN ANTONIO DIVISION

4           ALBERT SIDNEY JOHNSTON         )  
5           Chapter No. 2060, United         )  
6           Daughters of the                 )  
7           Confederacy, ROBIN                 )  
8           TERRAZAS, President, JEAN         )  
9           CAROL LANE, First                 )  
10          Vice-President,                     )  
11          PLAINTIFFS,                         )  
12          VS.                                 ) CIVIL ACTION NO.  
13          THE CITY OF SAN ANTONIO,         ) SA-17-CV-1072-DAE  
14          DEFENDANT.                         )

**ORIGINAL**

15   \*\*\*\*\*  
16   ORAL DEPOSITION OF  
17   ROBIN TERRAZAS, AS REPRESENTATIVE OF  
18   ALBERT SIDNEY JOHNSTON CHAPTER NO. 2060  
19   SEPTEMBER 21, 2018  
20   \*\*\*\*\*

21   ORAL DEPOSITION of ROBIN TERRAZAS, produced as a  
22   witness at the instance of the Defendant, and duly  
23   sworn, was taken in the above-styled and numbered  
24   cause on the 21st day of September, 2018, from  
25   12:58 p.m. to 1:44 p.m., before Sharon L. McDonald,  
   CSR, in and for the State of Texas, reported by  
   machine shorthand, at the Law Offices of the Thomas J.  
   Crane, 110 Broadway, Suite 420, San Antonio, Texas,  
   pursuant to the Federal Rules of Civil Procedure and  
   the provisions stated on the record or attached  
   hereto.

1 Q Okay. So I'm specifically asking about the  
2 land.

3 A Uh-huh.

4 Q Just to be real clear here.

5 A Right.

6 Q Because I'm not sure I asked that question  
7 clearly. So I think my last question was: Where did the  
8 chapter obtain the interest in the land?

9 A Interest as in -- again, it's not interest in  
10 the land to do whatever they want to with it. It's  
11 interest in the land for the statue to remain in Travis  
12 Park. And it comes through the ordinance which states  
13 United Daughters of the Confederacy -- Barnard Bee was  
14 the chapter at that time who made this happen, but then  
15 they transferred responsibility verbally to the Albert  
16 Sidney Johnston Chapter as well as presenting the copy of  
17 the ordinance.

18 Q So, essentially, your contention is that it  
19 was the ordinance that created that interest?

20 A Yes. The ordinance is what gives the United  
21 Daughters of the Confederacy as a whole -- it says,  
22 United Daughters Confederacy -- the right for that statue  
23 to be in the middle of the park. That occurs because of  
24 the efforts of the Barnard Bee Chapter who when they  
25 disbanded essentially asked Albert Sidney Johnston 2060

1 to be watchful over the statue which sits in Travis Park.

2 Q Was there anything other than the ordinance that  
3 you mentioned that created the interest in --

4 A For the land.

5 Q -- for the land in Travis Park property?

6 A No. It's all based on that ordinance.

7 Q And what -- I think you've already kind of  
8 answered this, but what does the interest entitle the  
9 chapter to do with the land?

10 A Put the statue there.

11 Q And does it allow anything else that you're  
12 aware of?

13 A No. It specifically states for the statue.

14 Q And what is the chapter's contention with  
15 respect to the duration of the chapter's interest in  
16 Travis Park property?

17 A Basically it would be eternal. There's no --  
18 nowhere that says anything of any reason that it would  
19 ever be removed.

20 Q And does the chapter claim any other right in  
21 Travis Park land than what you've described so far?

22 A No. Just for the statue to be there in the  
23 center of the park.

24 Q And is it ASJ's -- I'm sorry -- the chapter's  
25 contention that the property interest was conveyed by

1 A Right. 1899 was the ordinance.

2 Q All right. So we'll go with 1899.

3 A Okay.

4 Q Does the chapter contend that the City made any  
5 other representations concerning the Travis Park land  
6 beyond what's in the document?

7 A I know there, at some point, they did have  
8 discussions of what they wanted to do with the park  
9 around that time and they did defer to that the ladies of  
10 the UDC would not approve anything different because they  
11 had already been promised the use of that land for the  
12 statue.

13 So in some places it does insinuate that  
14 maybe they had more interest even than just for the  
15 statue or that they had -- it showed that they had, I  
16 guess, the right to say whether or not the statue would  
17 still go there, and they knew that they wouldn't want it  
18 any other way, but I can't tell you exactly where that  
19 was. I just know that there were City conversations  
20 regarding that.

21 Q Okay. And when were the City conversations that  
22 you're referring to? When did those happen?

23 A That was around the time that the monument went  
24 up. I'm thinking it might have been after the  
25 cornerstone was laid, but they had not yet put up the

1 actual statue. And they were wanting to build a library  
2 that they -- it seems like it was the federal government  
3 was giving them money to build a library, and they were  
4 considering putting that in Travis Park, but they had  
5 already promised that to the UDC. And so in those  
6 conversations, they were very mindful of the fact that  
7 UDC was not going to want to change their plans.

8 Q Okay. So you're referring to conversations or  
9 comments or statements that occurred after the property  
10 interest was created, correct?

11 A Uh-huh. After 189 -- it would have been after  
12 the ordinance had been placed in 1899.

13 Q So specifically what I'm asking is: Does the  
14 chapter know of any other representations that were  
15 communicated by the City of San Antonio to any recipient  
16 of Travis Park property other than what's in the  
17 ordinance -- the document you're referring to as an  
18 ordinance -- at the time or before the time that it was  
19 passed?

20 A The only thing that I know that was given  
21 directly to them as an official piece of paper would have  
22 been that ordinance. Other than that, there's proof just  
23 through these conversations that they were deferring to  
24 the UDC as to what happened with that land, but that  
25 wasn't something that was handed in writing to the UDC.

1 Q Okay. And what do you contend was handed in  
2 writing to whoever received it, whether it was Bee or  
3 UDC?

4 A The 1899 ordinance.

5 Q And who handed it to them?

6 A I have no idea.

7 Q Well, let me ask you these questions, then. Are  
8 you aware of any instrument that created the right that  
9 you've described to possessory interest in land in Travis  
10 Park that was signed by the city?

11 A Other than the ordinance?

12 Q Yes. The ordinance. The thing you're referring  
13 to, an ordinance.

14 A I don't know of anything else.

15 Q Do you know whether that was signed by the City?

16 A I would assume they would have had to have  
17 signed it, but I haven't seen it.

18 Q Okay. Does the chapter have a copy of any  
19 document signed by the City that conveys a possessory  
20 interest in Travis Park?

21 A All I have is the documentation that I showed  
22 you that the City was giving permission to the UDC in  
23 1899.

24 Q Okay. So when the City -- what I'm asking is:  
25 Does the chapter know whether when the City gave that --

1 A Uh-huh.

2 Q I want to know if you have an understanding of  
3 what that chapter, Barnard E. Bee, believed it was  
4 receiving from the City back in 1899 at the time they  
5 took the property or -- the Travis Park property?

6 A I would say it remained the same because there's  
7 a lot of verbal from -- I mean, from 1899 until 1976, you  
8 had members who were members, I think, for a very long  
9 time, and they would talk about -- and we still have  
10 members now that remember -- she calls them the old  
11 timers -- talking about how they own the monument from  
12 way back when and I think that that oral history just was  
13 passed down. So I would feel comfortable that how they  
14 represented it and felt in 1976 would be similar to how  
15 they were thinking in 1899.

16 Q And just for the purpose of a clean record, let  
17 me ask the question again, but specifically with respect  
18 to the possessory interest in land in Travis Park.

19 A Right.

20 Q And the question is: Do you have an  
21 understanding of what the Bee chapter believed back in  
22 1899 it was receiving from the City with respect to that  
23 real property interest?

24 A Use of the land for the monument to be placed  
25 there and to remain there.

1 about what the ASJ chapter owns or has a right to, were  
2 you basing your answers on your understanding, not  
3 necessarily a legal understanding?

4 A Yes. As best I could try to answer the  
5 questions.

6 Q In fact, Mr. Fitzpatrick mentioned recording and  
7 property records. Have you ever gone to property records  
8 in Bexar County or any other county to file something?

9 A No. I don't recall ever doing anything like  
10 that.

11 Q If tomorrow you had to go file some written  
12 piece of paper with property records in Bexar County,  
13 would you know how to do that?

14 A No.

15 Q And summer of 2017, did you have communications  
16 with the City of San Antonio about the Travis Park  
17 memorial?

18 A I attempted to.

19 Q Did you --

20 A I sent emails and I tried making phone calls and  
21 I went to city council. Yes, I attempted. I  
22 communicated with them as best I could in my attempts.

23 Q Did you communicate to anyone working for the  
24 City of San Antonio that you believe your chapter owned  
25 the Travis Park memorial?

1 A Yes.

2 Q Who was that communication with?

3 A Jackie Salvador.

4 Q Did you communicate with Ms. Salvador, or  
5 anybody else, your belief that the chapter had some right  
6 to use of the land in Travis Park?

7 A Yes.

8 Q Was that with Ms. Salvador or anybody else?

9 A Ms. Salvador, and I also explained to Mayor  
10 Nirenberg's secretary, Alice, that there was an issue  
11 with the land and that it was very important that I speak  
12 with Mayor Nirenberg before they had that vote, and so --  
13 but I was unable to speak with him.

14 Q And that was with the mayor's secretary?

15 A Yes.

16 Q Did she ask follow-up questions about how you  
17 guys -- how it is that you guys think you own something?

18 A She asked me to fill out a piece of paper and I  
19 was so nervous I couldn't even write. And I told her I  
20 really didn't want to put anything in writing because  
21 what we needed was a conversation face to face because if  
22 you write something down, people will put in their -- you  
23 know, it's better to have the discussion than to write  
24 something and leave it for someone just to -- I didn't  
25 say all that to her, but that was why. So I did put a

1 request -- I filled out a piece of paper that requested  
2 to meet with the mayor and no one has ever called me.

3 Q So did she ever ask you how it is that you guys  
4 think you own the memorial?

5 A No. We didn't have a discussion about that.  
6 She knew that there was -- I mean, I did tell her that I  
7 was there to talk to him about Travis Park and the land  
8 and that it was...

9 Q Did she ever say, Please show me whatever  
10 paperwork you have --

11 A No.

12 Q -- regarding the memorial?

13 A No.

14 Q Did she show any interest in how you guys might  
15 own the memorial?

16 A No.

17 MR. CRANE: I have no other questions until  
18 trial. Thank you.

19 MR. FITZPATRICK: I think I have some  
20 follow-up based on that.

21 EXAMINATION

22 BY MR. FITZPATRICK:

23 Q So when I asked you what the chapter's -- when I  
24 asked you to describe the interest that the chapter was  
25 claiming in Travis Park property, you explained that to

1 you closed on the house?

2 A Whatever was supposed to happen, happened.

3 Q So if you were interested in filing a deed or  
4 some type of indication of ownership, would you know how  
5 to go about asking someone to find out how to do it?

6 A I could figure it out, but I wouldn't be able to  
7 go directly to do it. I don't know who I would ask  
8 first.

9 Q So this conversation that you had with Alice.

10 A Yes.

11 Q When -- what was the date of that?

12 A It was -- I think it was a couple of days before  
13 the city council vote. It was definitely the week of  
14 that vote because I had been trying to call and I had  
15 been sending emails and no one was responding. And so I  
16 finally, because it was getting so close, just went down  
17 to city hall to see if I could talk to somebody and Alice  
18 was the only one that I was able to speak with --

19 Q Did you --

20 A -- and.

21 Q Go ahead.

22 A I explained to her the importance of speaking  
23 with the mayor because we had concerns about the property  
24 in Travis Park. And I did not have a detailed  
25 conversation with her. She asked me to fill out a form

1 of what the issues were, and I told her it was -- I just  
2 needed to talk to the mayor. I didn't want to put  
3 anything in writing. I wanted to discuss it with him.

4 Q So the meeting was on Thursday, the 31st of  
5 August, correct?

6 A Do you mean when they voted?

7 Q Yes.

8 A Yes. So it was maybe a couple of days prior to  
9 that.

10 Q So it was sometime Monday, Tuesday or Wednesday  
11 or Thursday?

12 A It was probably Monday or Tuesday because after  
13 that -- well, she went back behind closed doors and came  
14 back and said, He's not going to be able to meet with  
15 you. The best I can do is maybe his policy adviser can  
16 call you. So she did call and I told her we had concerns  
17 and she said, Go to city council. So -- the city council  
18 hearing. So I know it was before that.

19 Q Did you tell her anything more specific than, We  
20 have concerns about the property?

21 A I think I mentioned to her that we didn't know  
22 even who owned the land. I mean, where was the deed, but  
23 I didn't get into anything else with her. I just wanted  
24 her to realize that there were questions that needed to  
25 be answered and we needed to talk about it.

1 Q You did not tell her that you thought your  
2 chapter owned the Travis Park land, correct?

3 A No. Right.

4 Q You didn't tell her that you thought your  
5 chapter had a right to use the Travis Park land forever,  
6 correct?

7 A I did not have that sort of conversation. She's  
8 not the decision-maker. What I was trying to show her  
9 was that it was very important that I speak with the  
10 mayor before he had that vote.

11 Q Okay. You indicated a conversation with  
12 Ms. Salvador in response to your -- your lawyer's  
13 questioning. Do you recall giving that answer just a  
14 minute ago?

15 A That I gave her -- yes. I gave her information  
16 regarding the ordinance.

17 Q Did you ever tell Ms. Salvador that your chapter  
18 claimed to have a right to use the land in the middle of  
19 Travis Park forever?

20 A I don't remember. I think so. It was all  
21 through emails, so it would be in an email.

22 Q So anything you told Ms. Salvador would be in  
23 the emails?

24 A Yes.

25 Q Okay. And those emails have been exchanged by